

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

CASSANDRA SIMON, SYDNEY TESTMAN,
MIGUEL LUNA, ISABELLA CAMPOS,
DANA PATTON, RICHARD FORDING AND
THE ALABAMA STATE CONFERENCE OF
THE NAACP

Plaintiffs,

v.

KAY IVEY in her official capacity as Governor of Alabama and President Ex-Officio of the University of Alabama Board of Trustees, SCOTT PHELPS in his official capacity as President Pro Tempore, University of Alabama Board of Trustees, MIKE BROCK, KAREN BROOKS, MYLA E. CALHOUN, RONALD GRAY, JEFF GRONBERG, O.B. GRAYSON HALL JR., BARBARA HUMPHREY, W. DAVIS MALONE III, EVELYN VANSANT MAULDIN, HARRIS MORRISSETTE, J. STEVEN ROY, KENNETH SIMON, MARIETTA URQUHART and KENNETH VANDERVOORT in their official capacities as members of the University of Alabama Board of Trustees

Defendants.

Case No. 2:25-cv-00067-RDP

**PLAINTIFFS UNOPPOSED MOTION FOR LEAVE TO FILE A CONSOLIDATED
RESPONSE MEMORANDUM**

Plaintiffs Cassandra Simon, Richard C. Fording, Dana Patton, Sydney Testman, Miguel Luna, Isabella Campos, and the Alabama State Conference of the NAACP (collectively, “Plaintiffs”), through their undersigned counsel, respectfully move to request leave of this Court to file a consolidated response memorandum to the motions to dismiss filed by Defendant Kay Ivey (ECF No. 32) and Board Defendants (ECF No. 33) (collectively, “Defendants”). Plaintiffs

further request to file the requested consolidated response memorandum as an oversized brief, not to exceed 50 pages, in light of Plaintiffs' request to file a single, consolidated memorandum in response to Defendants' multiple motions to dismiss.

Dated this 18th day of April 2025.

Respectfully submitted,

/s/ Alison Mollman

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CERTIFICATE OF SERVICE

I hereby certify that, on April 18, 2025, the foregoing motion was filed electronically and will be sent electronically to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/Alison Mollman

Alison Mollman
ACLU of Alabama